

Exhibit 1



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Transcript of Podcast Excerpt - Interview of Joseph Tacopina

Date: August 14, 2020

Planet Depos

Phone: 888.433.3767

Email: transcripts@planetdepos.com

www.planetdepos.com

Transcript of Podcast Excerpt - Interview of Joseph Tacopina

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<p>1</p> <p>2</p> <p>3 WASHINGTON FOOTBALL TALK</p> <p>4 Three Outstanding interviews with Scott Turner,</p> <p>5 Terry McLaurin and Dan Snyder's attorney,</p> <p>6 plus, Reuben Foster</p> <p>7</p> <p>8</p> <p>9 Podcast interview of JOSEPH TACOPINA by JP FINLAY</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20 Job: 315770</p> <p>21 Pages: 1 - 19</p> <p>22 Transcribed by: Steph Mistele</p>	<p>3</p> <p>1 him, had nothing to do with him, yet an article</p> <p>2 actually hit the internet and made its rounds on</p> <p>3 social media after the fact.</p> <p>4 That was an article the was put out by a</p> <p>5 company that we believe is a sort of corruptive</p> <p>6 information machine, serving as a higher gun to</p> <p>7 conceal bitters.</p> <p>8 We have sued that company in India. They've</p> <p>9 since removed the article, of course. They said, "Oh,</p> <p>10 there was some mistakes in reporting." I mean, that's</p> <p>11 not-- you know, mistakes in reporting is saying he</p> <p>12 was born in '65 as opposed to '66. That's a mistake</p> <p>13 in reporting. Mistake in reporting is not like</p> <p>14 linking someone to Jeffrey Epstein and calling</p> <p>15 someone a pedophile when you have a, you know, family</p> <p>16 and children and a wife who has to (inaudible) this.</p> <p>17 We believe there's, obviously, people behind</p> <p>18 that who had their own purposes for doing it. And</p> <p>19 this legal action that we brought, not only the</p> <p>20 defamation lawsuit, but the 1782 federal court action</p> <p>21 of the United States seeking evidence-- documentary</p> <p>22 evidence, sworn testimony, to really uncover who's</p>
<p>2</p> <p>1 P R O C E E D I N G S</p> <p>2</p> <p>3 JP FINLAY: Okay, we are very pleased to welcome</p> <p>4 in Joe Tacopina, who is the attorney for Dan Snyder</p> <p>5 in litigation, defamation lawsuits against some wild</p> <p>6 rumors that were spread after the Washington Post--</p> <p>7 or maybe even before the Washington Post report came</p> <p>8 out about sexual harassment inside the Washington</p> <p>9 Football Team organization.</p> <p>10 Joe, I'm going to stop trying to talk because I</p> <p>11 am bad when it gets into the nitty gritty of legal</p> <p>12 matters. Maybe you can tell me what you're doing for</p> <p>13 Mr. Snyder.</p> <p>14 JOE TACOPINA: Sure. I mean, we're pursuing</p> <p>15 people who were behind this really horrific story</p> <p>16 about Mr. Snyder. A series of horrific stories--</p> <p>17 false stories, including an article that linked him</p> <p>18 to Jeffrey Epstein. I mean, perhaps the worst thing</p> <p>19 you can do to an individual in this day and age is to</p> <p>20 associate one with Jeffrey Epstein, the poster child</p> <p>21 for pedophilia, for sexual abuse.</p> <p>22 You know, Dan Snyder has nothing to do with</p>	<p>4</p> <p>1 behind the scenes, who's pulling the strings, that</p> <p>2 got these articles printed.</p> <p>3 The legal action, we believe, will pierce the</p> <p>4 cloak of anonymity that this Meaww company, this</p> <p>5 media company from India, has used to protect</p> <p>6 nefarious clients.</p> <p>7 So, that's what this is about.</p> <p>8 JP FINLAY: So, who do you think is doing it?</p> <p>9 JOE TACOPINA: Well, we know that the person in</p> <p>10 the front of some of this bidding was this Mary Ellen</p> <p>11 Blair, a former disgruntled employee, who we filed a</p> <p>12 1782 federal court action against (inaudible).</p> <p>13 JP FINLAY: What is 1782 federal action mean?</p> <p>14 They have to tell the truth or something?</p> <p>15 JOE TACOPINA: It's a unique sort of thing</p> <p>16 because it allows for evidence to be produced and</p> <p>17 testimony to be taken with the court's permission in</p> <p>18 the United States for a foreign action. In this</p> <p>19 instance, we sued for defamation in India. And so--</p> <p>20 JP FINLAY: Okay.</p> <p>21 JOE TACOPINA: --this will uncover evidence that</p> <p>22 was captured here in the United States. And that's</p>

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<p style="text-align: right;">5</p> <p>1 what that's about.</p> <p>2 And really, you know, at this point, Mr. Snyder</p> <p>3 will not stand by idly as criminals, for their own</p> <p>4 malicious reasons, seek to soil his good name. And</p> <p>5 that's what these were, these were criminal acts,</p> <p>6 make no mistake about it. I'm not afraid to mince</p> <p>7 those words.</p> <p>8 But when people bribe people, and all for money</p> <p>9 to present false stories about an individual, that's</p> <p>10 a bribe. When people offer to wire money or do wire</p> <p>11 money to perpetrate that fraud, that's a wire fraud.</p> <p>12 When there's--</p> <p>13 JP FINLAY: But this sounds kind of crazy,</p> <p>14 right? I mean, this sounds...</p> <p>15 JOE TACOPINA: It is crazy. And honestly, you</p> <p>16 know, if we hadn't investigated it as thoroughly as</p> <p>17 we had, it'd be hard for me to believe.</p> <p>18 And you really-- it's the level-- but I've also</p> <p>19 seen something that is, you know, we sort of, I</p> <p>20 think, take for granted, but Daniel Snyder's a real</p> <p>21 person. He's a terrific-- he and his wife Tanya are</p> <p>22 terrific people. They have three beautiful children.</p>	<p style="text-align: right;">7</p> <p>1 court filings, I have to stay within the four corners</p> <p>2 of that. Obviously, we've done an investigation and I</p> <p>3 have my own beliefs and my own opinions, but before I</p> <p>4 opine, I want to have rock solid evidence.</p> <p>5 But, you know, there's a lot of things going on</p> <p>6 in Washington right now regarding the club, and there</p> <p>7 are people who may have some motives to falsely</p> <p>8 attack Mr. Snyder. I'm not going to speculate as to</p> <p>9 who they are or what it is, but what I do know is</p> <p>10 that this one individual - this formal disgruntled</p> <p>11 employee - has spoken to various witnesses-- various</p> <p>12 individuals in attempts to get them to provide false</p> <p>13 information about Dan Snyder. Speak to the media and</p> <p>14 offer them money to do so and basically remunerate</p> <p>15 them for doing these sorts of things.</p> <p>16 We have sworn affidavits to back that up, and</p> <p>17 we have audio tape recordings to back that up. So,</p> <p>18 you know, we wouldn't be making these filings if we</p> <p>19 weren't rock solid in our proof.</p> <p>20 JP FINLAY: This is major. There's a lot going</p> <p>21 on here, and I'm not a legal mind. So, forgive me if</p> <p>22 my questions are kind of elementary. Does any of</p>
<p style="text-align: right;">6</p> <p>1 They do a lot for their community. They do a lot of</p> <p>2 philanthropic things. And to be-- come under attack</p> <p>3 by people who have criminal intent and criminal</p> <p>4 motive, and plant articles that are intended to</p> <p>5 destroy one's reputation and really hurt a family, is</p> <p>6 something that I won't stand by idly. I'll come down</p> <p>7 like a legal hammer on anyone who's behind this, and</p> <p>8 we will get to who's behind this.</p> <p>9 But we know-- we have strong evidence that Mary</p> <p>10 Ellen Blair was doing the bidding and complicit and</p> <p>11 in the pocket of another-- at least one other</p> <p>12 individual trying to defame Mr. Snyder.</p> <p>13 You know, we have--</p> <p>14 JP FINLAY: Who?</p> <p>15 JOE TACOPINA: Who is what this is all about.</p> <p>16 What the 1782 action was all about is who. We will</p> <p>17 find out who through the course of this action. But,</p> <p>18 you know, we have--</p> <p>19 JP FINLAY: And the next question is, why?</p> <p>20 JOE TACOPINA: That's another thing we hope to</p> <p>21 find out in the course of this action. Look, I don't</p> <p>22 want to speculate and for the purposes of our federal</p>	<p style="text-align: right;">8</p> <p>1 this have anything to do with the 40% of the team</p> <p>2 that's up for sale?</p> <p>3 JOE TACOPINA: You know, there's, again,</p> <p>4 there's, I think common sense will sort of play out.</p> <p>5 I think the evidence in this case will present us</p> <p>6 with who's behind this. But I can't-- I just won't.</p> <p>7 It wouldn't be appropriate for me to speculate or</p> <p>8 give my opinion on what this is about.</p> <p>9 But, you know, I read some articles today in</p> <p>10 various publications that sort of make that</p> <p>11 connection. That's, you know, any journalist is free</p> <p>12 to do that, I think. You know, they're using whatever</p> <p>13 common sense they want to apply, but I'm not going to</p> <p>14 do this at that time.</p> <p>15 Again, this is-- the purpose of this is the</p> <p>16 first step in this legal action to try to uncover</p> <p>17 information as to who's behind this. This one</p> <p>18 individual has identified people when speaking to</p> <p>19 others, and we'll see. We're looking to get her under</p> <p>20 oath and take some testimony.</p> <p>21 JP FINLAY: I mean, I know there was an article</p> <p>22 in the New York Times. It's kind of specifically</p>


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<p style="text-align: right;">9</p> <p>1 about this. What do you say as the attorney for Dan</p> <p>2 when people ask, "Hey, if you just let this go,</p> <p>3 everybody will stop talking about it and it'll go</p> <p>4 away"?</p> <p>5 JOE TACOPINA: You know what? Dan is quite a</p> <p>6 courageous individual. He's doing this, not only for</p> <p>7 himself and his family, but there's a whole host of</p> <p>8 other people out there, including other owners.</p> <p>9 I mean, just imagine every time you have a</p> <p>10 dispute with someone or you want to try to put them</p> <p>11 in a position of weaken stance or try to get them out</p> <p>12 of an organization, you spread false rumors.</p> <p>13 But not rumors, horrifically inaccurate</p> <p>14 slanderous stories about someone and get it</p> <p>15 published, and then have that publication be</p> <p>16 retweeted and reposted on the internet all over the</p> <p>17 place. And your kids are reading and people are</p> <p>18 approaching your kids and your wife.</p> <p>19 And so, you know what? Even if this story--</p> <p>20 look, and that organization took that article down -</p> <p>21 that Jeffrey Epstein article - because it's false.</p> <p>22 It's outrageous. It's defamatory. It's slanderous.</p>	<p style="text-align: right;">11</p> <p>1 But it does it not matter that it's some random</p> <p>2 website that nobody has heard of?</p> <p>3 JOE TACOPINA: It matters. Of course, it wasn't,</p> <p>4 you know, the New York Times, the Washington Post or</p> <p>5 anything like that, NBCSports.com, but it was-- it</p> <p>6 was a publication that was put out there and that was</p> <p>7 picked up. And picked up to the point where it</p> <p>8 reached his home and his children and his wife and</p> <p>9 his friends and his community.</p> <p>10 So, I don't care what the name of the</p> <p>11 publication is. The fact that someone planted a false</p> <p>12 story-- again, not just a false story, but a</p> <p>13 horrifically damaging false story about Dan Snyder</p> <p>14 that couldn't be further from the truth, is something</p> <p>15 that, you know, we're going to hold them accountable</p> <p>16 for because, again, these are crimes that were</p> <p>17 committed. This is not just a--</p> <p>18 JP FINLAY: Well, and the allegation is that</p> <p>19 they did this-- they paid their way to do this and</p> <p>20 they did it as part of a larger conspiracy, right?</p> <p>21 JOE TACOPINA: Yeah.</p> <p>22 JP FINLAY: That's heavy duty.</p>
<p style="text-align: right;">10</p> <p>1 It's criminal. They took it down, but that's not the</p> <p>2 end of it. Okay? Because now we're at the point now,</p> <p>3 Dan will not stand by idly as these criminals, for</p> <p>4 their own malicious reasons, whatever those reasons</p> <p>5 may be, seek to soil his good name through outrageous</p> <p>6 lies. It's just not going to happen. I'm not going to</p> <p>7 let it happen and neither will he.</p> <p>8 JP FINLAY: All right, so, well, that's clear.</p> <p>9 It's not going to happen. You're pursuing this thing.</p> <p>10 The investigation you guys conducted. Is this happen-</p> <p>11 - I mean, this all happened within the last three</p> <p>12 weeks or so? Or were you guys digging around on this</p> <p>13 prior to the Washington Post report?</p> <p>14 Because the week where the world was waiting</p> <p>15 for that Post report is when, at least on my end, the</p> <p>16 amount of rumors started to go crazy. And I'll be</p> <p>17 honest, I've never even heard of this meaww.com,</p> <p>18 whatever they're called. I never saw the article, but</p> <p>19 I know how things spread, especially on, you know,</p> <p>20 Twitter, Facebook. If something's out there and it</p> <p>21 starts getting shared, there's a butterfly effect</p> <p>22 across a lot of mediums.</p>	<p style="text-align: right;">12</p> <p>1 JOE TACOPINA: We have proof that witnesses were</p> <p>2 offered money - money - to provide negative false</p> <p>3 information about Dan.</p> <p>4 JP FINLAY: I'm a journalist and I'm pretty much</p> <p>5 for sale on about everything. If you want me to start</p> <p>6 reading ads for your law office on my podcast, I'm</p> <p>7 available, Joe. But none of us are available for hire</p> <p>8 to spread falsehoods, right?</p> <p>9 JOE TACOPINA: Those who are journalists, and</p> <p>10 there is journalistic integrity and (inaudible)</p> <p>11 reason, and we have an affidavit also about this</p> <p>12 company in particular, this Meaww and how they</p> <p>13 operate. It's, you know, obviously they're in India</p> <p>14 and they're operating with very different</p> <p>15 journalistic standards.</p> <p>16 And you know, the fact that they wrote a</p> <p>17 horrific article like that, pulled it right down and</p> <p>18 then came up with some, I mean, almost laughable</p> <p>19 excuse as to what happened-- errors in reporting. I</p> <p>20 mean, you know, it's not going to cut it. And we have</p> <p>21 proof that that company is a disinformation machine</p> <p>22 that is serving hired guns and concealed bitters.</p>

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<p style="text-align: right;">13</p> <p>1 JP FINLAY: What's your goal with this thing?</p> <p>2 The goal is not to prosecute in India, right? I</p> <p>3 imagine you want everything to happen here in the old</p> <p>4 US of A?</p> <p>5 JOE TACOPINA: We are-- we did sue that company</p> <p>6 in India. That's for sure. But, yes, here's our goal,</p> <p>7 and here's Mr. Snyder and Tanya's goal and the Snyder</p> <p>8 family and anyone who cares about what's fair and</p> <p>9 just and right. The goal is to ensure that the full</p> <p>10 weight of the law comes down heavily on those</p> <p>11 responsible for these heinous acts. That's the goal,</p> <p>12 and that's what will happen. And then make sure that</p> <p>13 people understand, if they even think about doing</p> <p>14 something as stupid as this, they're going to have</p> <p>15 hell to pay.</p> <p>16 JP FINLAY: How did you narrow it down? Is it</p> <p>17 Mary Ellen Blair? Do I have the name right?</p> <p>18 JOE TACOPINA: That's one. Yes, that's right.</p> <p>19 JP FINLAY: How did you zero in on her in such a</p> <p>20 short time period?</p> <p>21 JOE TACOPINA: We have a good investigative</p> <p>22 team. I mean, that's how we did it. But also--</p>	<p style="text-align: right;">15</p> <p>1 One of the critics would point to Dan and say</p> <p>2 he's been litigious throughout his term as ownership.</p> <p>3 Even if this is entirely different than things in the</p> <p>4 past - suing the city paper, suing season</p> <p>5 ticketholders, whatever - do you think that's a</p> <p>6 problem for him to be seen as litigious?</p> <p>7 JOE TACOPINA: Look, I know who he is as a human</p> <p>8 being, as a person, as an owner, as-- I mean, he's</p> <p>9 one of the-- he's a great American success story. His</p> <p>10 team is one of the greatest franchises in sports.</p> <p>11 And honestly, you know, what he's been</p> <p>12 litigious about in the past, I've not been involved</p> <p>13 in, so I really can't speak that. And I honestly</p> <p>14 don't care about it.</p> <p>15 What I care about is what happened here and the</p> <p>16 facts that have been uncovered here are absolutely</p> <p>17 outrageous. And really, I think anyone with courage</p> <p>18 and the wherewithal to fight back, would fight back.</p> <p>19 I've seen emotions-- raw emotions from that family</p> <p>20 based on things that were written about him that were</p> <p>21 not true. You know, it bothers me-- troubles me that</p> <p>22 anyone should have to go through that no matter how</p>
<p style="text-align: right;">14</p> <p>1 JP FINLAY: Is that your background? Are you an</p> <p>2 investigative attorney?</p> <p>3 JOE TACOPINA: Yeah, I'm a former prosecutor.</p> <p>4 But it's not so much me. We have a team of attorneys.</p> <p>5 Believe me, I'm the low guy on the totem pole when it</p> <p>6 comes to the brainpower in this group here and when</p> <p>7 it comes to the investigative skills of our team.</p> <p>8 But, you know, we have former law enforcement</p> <p>9 officials are part of our team who dug.</p> <p>10 You know, a lot of this was real easy to find</p> <p>11 because people came to us. People came to Dan and</p> <p>12 said, you know, "I was approached and here's what</p> <p>13 they said." And these people were willing to give</p> <p>14 under oath sworn affidavits under the penalties of</p> <p>15 perjury that what was said to them was truthful.</p> <p>16 Other individuals recorded conversations.</p> <p>17 So, as I said, you know, we sit here pretty</p> <p>18 confident about where this is going.</p> <p>19 JP FINLAY: Wow. This is-- I've been covering</p> <p>20 the Washington Football Team in some capacity for</p> <p>21 about 8 seasons and you never know what corner you're</p> <p>22 going to turn next.</p>	<p style="text-align: right;">16</p> <p>1 litigious they may be or may not be.</p> <p>2 But no one asked for this, and no matter what</p> <p>3 happens in a courtroom where people have legal</p> <p>4 disputes all the time, you know, you play by the</p> <p>5 rules. But this is not playing by the rules. If</p> <p>6 someone's trying to get a tactical advantage by</p> <p>7 trying to smear him, defame him, slander him, and</p> <p>8 thinks that somehow that's going to help in a legal</p> <p>9 proceeding, they're wrong. And that's not how the</p> <p>10 process works.</p> <p>11 JP FINLAY: Joe, I got to say, I really</p> <p>12 appreciate your time. And I want to say this on the</p> <p>13 record for posterity, I don't want to mess with you,</p> <p>14 man. I don't want you-- I don't want to be on your</p> <p>15 bad side.</p> <p>16 JOE TACOPINA: I'm here for you, JP, if you need</p> <p>17 me, but I don't think you'll be in that position</p> <p>18 ever, hopefully.</p> <p>19 JP FINLAY: I hope not too. Where are you? Are</p> <p>20 you in New York? Are you DC? Where you based?</p> <p>21 JOE TACOPINA: New York City. Yes.</p> <p>22 JP FINLAY: How on earth are you a Canadians fan</p>

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<p>17</p> <p>1 if you're in New York?</p> <p>2 JOE TACOPINA: Grew up playing some junior</p> <p>3 hockey in Verdun, a suburb of Montreal. Just, you</p> <p>4 know, before the internet was a thing, and I used to</p> <p>5 spend a lot of time at The Forum. And you know, if</p> <p>6 you've been to the Montreal Forum, you'd fall in love</p> <p>7 real quick. That's a different place. It's the mecca</p> <p>8 of-- it was the mecca of hockey. And certainly,</p> <p>9 seeing guys like Guy LaFleur or Ken Dryden and</p> <p>10 players like that, sort of change your perspective on</p> <p>11 hockey. So, that's it. Once a Habs fan, always a Habs</p> <p>12 fan.</p> <p>13 JP FINLAY: I get that for sure. That's kind of</p> <p>14 how I stumbled into my line of work, is I loved the</p> <p>15 Washington Football Team as a kid and saw some really</p> <p>16 great players, some really teams. Obviously,</p> <p>17 everybody hopes it can back to that. Do you know Alan</p> <p>18 May? Played for the Caps, is a broadcaster now.</p> <p>19 JOE TACOPINA: Yeah. I remember him, yeah.</p> <p>20 JP FINLAY: You kind of look like him. Like, you</p> <p>21 give off that tough guy hockey vibe and (inaudible)</p> <p>22 has the same thing. It's working for you.</p>	<p>19</p> <p>1 CERTIFICATE OF TRANSCRIBER</p> <p>2 I, Steph Mistele, do hereby certify that</p> <p>3 the foregoing transcript is a true and correct record</p> <p>4 of the recorded proceedings; that said proceedings</p> <p>5 were transcribed to the best of my ability from the</p> <p>6 audio recording and supporting information; and that</p> <p>7 I am neither counsel for, related to, nor employed by</p> <p>8 any of the parties to this case and have no interest,</p> <p>9 financial or otherwise, in its outcome.</p> <p>10</p> <p>11</p> <p>12 </p> <p>13 _____</p> <p>14 Steph Mistele</p> <p>15 August 17, 2020</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
<p>18</p> <p>1 JOE TACOPINA: He's a bit of a tough guy,</p> <p>2 (inaudible)?</p> <p>3 JP FINLAY: Indeed. I think still is. I</p> <p>4 wouldn't-- I wouldn't mess with you, and I wouldn't</p> <p>5 mess with him. Joe, thank you for your time. I</p> <p>6 appreciate it, and who knows, maybe we'll speak</p> <p>7 again.</p> <p>8 JOE TACOPINA: Okay, guys, anytime. I'm here.</p> <p>9</p> <p>10</p> <p>11 (The recording was concluded.)</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	

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